

**FILED**  
**UNITED STATES DISTRICT COURT CLERKS OFFICE**  
**DISTRICT OF MASSACHUSETTS**

2005 FEB 22 P 2:04

**STEVEN RAMSEY,**  
Plaintiff

U.S. DISTRICT COURT  
Civil Action Number  
04-CV-10699-RCL  
DISTRICT OF MASS.

vs.

**JAY CASHMAN, INC.**  
Defendant

**JOINT MOTION TO EXTEND DISCOVERY AND PRE-TRIAL DEADLINES**

Now comes the plaintiff, Steven Ramsey, and the defendant, Jay Cashman Inc., through their counsel, and jointly move this Honorable Court to extend the discovery and other pre-trial deadlines. The parties respectfully pray that this Honorable Court extend the deadline for conducting factual discovery by 90 days, up to and including May 23, 2005, and that other pre-trial activity dates, including expert disclosures and the filing of motions, be extended by an equivalent 90 days.

As grounds for this motion, the parties assert that they have been diligent in their discovery. However, there are several factors that militate in favor of extending the pre-trial deadlines.

1. The plaintiff alleges he is a Jones Act seaman who was severely injured while working aboard the defendant's vessel during a marine construction project in New Jersey.

2. Many of the potential witnesses to the alleged incident are employed in the maritime field and their employment necessarily takes them from state to state. (See Plaintiff's deposition p. 136 ll. 18-21 "We go from state to state. You don't know these people. You know them for as long as you're working on a job. And then you're

somewhere else, working on a different job.”) As such, many of the witnesses have been difficult to locate and it has been difficult obtaining their depositions.

3. More specifically, the plaintiff wishes to obtain the deposition of Kenneth King, the plaintiff’s supervisor at the time of the incident and a witness in the case. Mr. King no longer works for the defendant. The defendant is currently unable to provide Mr. King’s address as he no longer resides at his former address. As such, the parties require additional time to locate and depose Mr. King, and other witnesses.

4. During the course of completing the aforementioned discovery, it is quite possible that additional witnesses or information may be identified that will require some additional discovery by the parties.

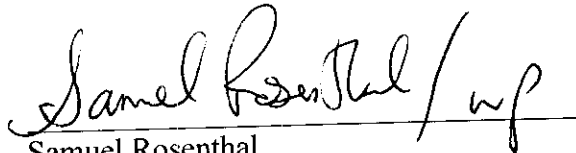
5. Furthermore, this case involves complex factual and legal issues and the parties respectfully assert that they require additional time to properly prepare the matter for trial.

Wherefore, the parties respectfully submit that it is in the best interests of the efficient administration of justice in this action to extend the deadline for completing factual discovery by 90 days, to May 23, 2005, and to extend all other deadlines by an equivalent 90 days.

Respectfully submitted,

Plaintiff Steven Ramsey,  
By his attorneys,

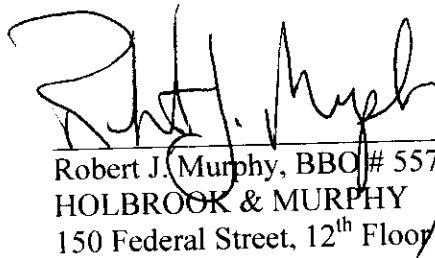
**BARRISH LAW OFFICES, P.C.**

A handwritten signature in cursive script, appearing to read "Samuel Rosenthal / w/p", written over a horizontal line.

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Defendant Jay Cashman, Inc  
By its Attorney

**HOLBROOK & MURPHY**

A handwritten signature in cursive script, appearing to read "Robert J. Murphy", written over a horizontal line.

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